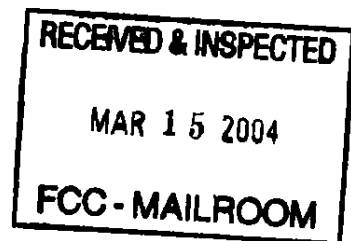


54 Century Lane  
Montross, Virginia 22520  
February 2, 2004

Secretary  
Federal Communications Commission  
Washington, D.C. 20554



IN RE: RM-10354

Dear Sir or Madam:

The American Radio Relay League (League) last week filed a comprehensive proposal with the Commission relating to amateur radio matters. In part, the filing incorporates an earlier League submittal (RM-10413) and it reflects to a considerable extent my own petition (RM-10354) filed earlier. The following comments are made in this context.

1. The League's most recent petition is strongly supportive of the concept of a new basic license, including much greater HF privileges. This was the basic thrust of RM-10354. The fact that the largest and most prestigious organization representing radio amateurs in the United States has endorsed this concept is evidence that RM-10354 has garnered significant support over time and now represents the mainstream of thinking among radio amateurs in the United States.
2. The League's proposal of last week goes further in addressing the need for broader frequency/mode privileges for basic licensees, but, as will be noted, it is still somewhat deficient.
3. Because of its comprehensive nature, the League's January 2004 proposal also includes matters that can be reserved for later consideration. It includes, for example, a contentious proposal to eliminate the requirement for licensees with HF privileges to demonstrate proficiency in Morse code except for the Amateur Extra license.
4. As I noted in commenting on the spate of code/no-code proposals released for comment by the Commission last year, there is at present no need to address the contentious code/no-code issue.
5. The concept of broader HF privileges for new licensees is, however, ripe for action now.
6. RM-10354 has been pending before the Commission since February 2002, when the comment period expired. Action on RM-10354 should not be delayed as a result of the League's new filing (cf. pp. 10-11 of the League's January 2004 petition) or of any other matter.

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7. Since the League's most recent petition includes changes in code requirements for radio amateur licensees, it is best left for consideration at a later date along with the code/no-code petitions.
8. The League's March 2002 filing (RM-10413) represented a big step forward. It did not, however, address sufficiently the needs of new radio amateurs for a basic license that would allow them to obtain broad experience on the HF bands, particularly with reference to modes other than CW. In this sense, it was inadequate and incomplete
9. RM-10354, on the other hand, was comprehensive in scope. The broader mode/frequency privileges proposed in RM-10354 should be given immediate consideration by the Commission in conjunction with, and superseded by, the CW privileges proposed in RM-10413 as outlined below. (I later commented that my original proposal should be broadened to include data modes, not just phone/CW.)
10. It should be noted that the frequency privileges recommended by the League for new licensees in RM-10413 are in some respects superior to those embodied in its most recent proposal. With regard to 80 meters, RM-10413 proposed (ITU 2) CW privileges for Novices to run from 3.525 MHz to 3.725 MHz, whereas the latest proposal is more restrictive — 3.55 MHz to 3.70 MHz. Similar tightening of CW privileges appears in the League's most recent proposal for the 40, 15 and 10 meter bands.
11. The Commission should authorize the HF CW privileges proposed in RM-10413 and broaden them to include data modes as well.
12. The proposed phone privileges for basic licensees in the League's most recent proposal are quite generous (with the caveat of items #11 & 12 below), and go well beyond what was proposed in RM-10354.
13. As in RM-10413, however, the League's latest proposal is in certain key aspects too restrictive. It would prohibit basic licensees from any activity on the 30, 17 and 12 meter bands, whereas RM-10354 permits limited CW/phone activity on these bands. For all intents and purposes, these are secondary bands and, particularly in the CW segments of 17 and 12 meters, have precious little activity at present. Nor can the 30 meter band (CW only) be considered crowded on most days/nights.
14. Newcomers to amateur radio should have access to the 30, 17 and 12 meter bands, both for CW/data and phone, in order to round out their HF experiences. To give just one reason, if basic licensees are restricted along the lines of the League's proposal, there will be contest weekends where the newcomers will have no place to run and hide.

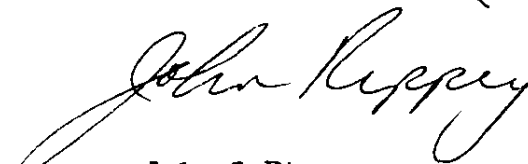
One of the virtues of the secondary HF bands is that non-contesters can (and do) use them on contest weekends (which are proliferating) as safe havens, away from the boisterous activity of contest stations. Basic licensees should be accorded access to the same safe havens.

15. RM-10354 did not contemplate reducing permissible output power for basic licensees below what was currently permissible for Novice licensees. The League's latest proposal does, in order to simplify further the entry-level examination. Also, the issue of the extent of VHF/UHF privileges for basic licensees was not addressed in RM-10354 (or RM-10413). Again, this is related to the question of what the content of the entry-level written examination should be. In any event, consideration of the content of the entry-level written examination is a matter separate and apart from the much more critical need for modernizing the HF privileges accorded newcomers to amateur radio. It can be left for later consideration along with the elimination of a code requirement for entry-level HF privileges.

In summary, the Commission now has before it, in RM-10354 (and, to an extent, RM-10413), the basis for moving ahead immediately with the now widely-supported notion of modernization of entry-level licensees' HF privileges.

Other issues, such as code/no-code, or the content of the entry-level license examination, need not—and should not—result in further delay. The time to act is now.

Sincerely yours,

A handwritten signature in cursive script, reading "John S. Rippey". The signature is fluid and elegant, with a long, sweeping underline that extends to the left.

John S. Rippey  
W3ULS